

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

CYNTISHA STEWART, TERRY BROWN,
EDUARDO CANTIZZANO, LISA HILL-GREEN,
THERESA HILL, YOLANDA JONES, MICHAEL
CLARK, and CHRISTOPHER PETERSON,

Plaintiffs,

v.

Civil Action No.: 3:20-cv-00903-JAG

LEXISNEXIS RISK DATA RETRIEVAL
SERVICES, LLC a/k/a LexisNexis Risk Data
Management and LEXISNEXIS RISK
SOLUTIONS, INC.,

Defendants.

**PLAINTIFFS' MOTION FOR FINAL
APPROVAL OF RULE 23(b)(2) SETTLEMENT**

Plaintiffs move, pursuant to Federal Rule of Civil Procedure 23, for final approval of the Rule 23(b)(2) injunctive-relief settlement of this class action. As shown before, the settlement is fair, reasonable, and adequate under any measure, resulted from arm's-length and contentious negotiations, resolves hard-fought claims on behalf of thousands of consumers and provides significant prospective benefit in exchange for only modest class member consideration. For the reasons set forth in the accompanying Memorandum of Law, the Court should grant final approval pursuant to Federal Rule of Civil Procedure 23(e).

Dated: July 7, 2022

Respectfully submitted,

CYNTISHA STEWART, et. al.

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